

DISCOVERY PLAN WORKSHEET	
Phase I (Pre-Settlement Discovery)	
Deadline for completion of Rule 26(a) initial disclosures and HIPAA-compliant records authorizations:	August 3, 2018
Completion of date for Phase I discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	N/A
Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability.)</i>	N/A
Phase II (Discovery and Motion Practice)	
Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference.)</i>	August 24, 2018
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days past joining/amending.)</i>	September 14, 2018
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories.)</i>	January 4, 2019
<u>Expert reports for party bearing burden of proof completed by:¹</u>	February 1, 2019
<u>Expert reports for party not bearing burden of proof completed by:</u>	March 1, 2019
Expert depositions completed by: <i>(Presumptively 30 days post expert reports.)</i>	April 1, 2019
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference.)</i>	April 1, 2019
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery.)</i>	May 3, 2019
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	No

¹ The parties have revised the Discovery Plan Worksheet (DE 7) by bifurcating the expert discovery schedule. Revisions to the original Discovery Plan Worksheet are indicated with underlined text.